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CLERK OF THE COURT
NORTHERN DISTRICT OF OHIO

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

Laredo National Bancshares Inc., et al.,) Civil Action No. 1:00 CV 2081
)
Plaintiffs,) Judge Lesley Wells
) Magistrate Judge Nancy Vecchiarelli
vs.)
)
Donald E. Schulz, et al.,) **Plaintiffs' Initial Disclosures**
) **Pursuant to Fed. R. Civ. P. 26(a)**
Defendants.)

Now come plaintiffs, Laredo National Bancshares, Inc., The Laredo National Bank, and Gary G. Jacobs (hereinafter collectively referred to as "Laredo"), by and through their undersigned counsel, and offer for their disclosure, pursuant to Fed. R. Civ. P. 26(a)(1), the following:

A. Individuals Likely To Have Discoverable Information Relevant To Disputed Facts, Known At This Time, Include:

1) Donald E. Schulz, 19047 Winslow Road, Cleveland, Ohio 44122-4953. Plaintiffs anticipate that Mr. Schulz will provide discoverable information with respect to his interactions with the National Drug Intelligence Center ("NDIC"), his involvement with respect to the obtaining and distribution of the NDIC's draft executive summary "White Tiger" report, his interactions with various media outlets and reporters and the identities of

ORIGINAL

John Doe defendants 1-10.

2) Daniel S. Huffman, former Supervisory Intelligence Research Specialist at NDIC. Plaintiffs anticipate that Mr. Huffman will provide discoverable information with respect to his interactions with Mr. Schulz, the gathering and creation of the information set forth in the draft NDIC's White Tiger executive summary and the distribution of the White Tiger Executive Summary to individual(s) outside of the NDIC, and the identities of John Doe defendants 1-10.

3) Dolia Estevez, correspondent, El Financiero. Plaintiffs anticipate that Ms. Estevez will provide discoverable information with respect to her receipt and publication of the baseless allegations contained in the draft White Tiger executive summary, and the identities of John Doe defendants 1-10.

4) Jamie Dettmer, correspondent, Insight Magazine. Plaintiffs anticipate that Ms. Dettmer will provide discoverable information with respect to her receipt and publication of the baseless allegations contained in the draft White Tiger executive summary, and the identities of John Doe defendants 1-10.

5) Douglas Farah, correspondent, The Washington Post. Plaintiffs anticipate that Mr. Farah will provide discoverable information with respect to his receipt and publication of the baseless allegations contained in the draft White Tiger executive summary, and the identities of John Doe defendants 1-10.

6) Richard T. Licht, former head of security at NDIC, and current Supervisory Special Agent in Charge, Federal Bureau of Investigation. Plaintiffs anticipate that SSA Licht will testify about the importance of maintaining secrecy of the NDIC's controlled

information, will describe the NDIC's investigation, the unauthorized disclosure of the draft White Tiger executive summary, and his resulting conclusions.

7) John T. Counihan, Acting Executive Assistant, Supervisory Special Agent, Drug Enforcement Administration. Plaintiffs anticipate that Agent Counihan will testify about the NDIC investigation into the unauthorized disclosure of the draft White Tiger executive summary, and his resulting conclusions.

8) Kathleen Costlow, Office of Automation Assistant, NDIC. Plaintiffs anticipate that Ms. Costlow will provide discoverable information regarding the response letter from Huffman to Schulz, and her disclosure of that letter to NDIC investigators. She will also provide discoverable information about the drafting and mailing of this letter (along with an enclosed draft White Tiger executive summary) from Huffman to Schulz.

9) Tamara J. Cox Kessler, Special Investigative Counsel, Office of Inspector General, U.S. Department of Justice. Plaintiffs anticipate that Agent Kessler will provide discoverable information regarding the OIG investigation into the unauthorized disclosure of the draft White Tiger executive summary, and her resulting conclusions and recommendations.

10) Mark Pendleton, OIG Special Agent. Plaintiffs anticipate that Agent Pendleton will testify about the OIG investigation into the unauthorized disclosure of the draft White Tiger executive summary, and his resulting conclusions and recommendations.

11) Walker F. Todd, 1164 Sheerbrook Drive, Chagrin Falls, Ohio 44022. Plaintiffs anticipate that Mr. Todd will provide discoverable information with respect to his interaction with Schulz and various media entities and reporters relevant to plaintiffs and the

allegations contained in the draft White Tiger executive summary.

12) Michael T. Horn, Director, National Drug Intelligence Center. Plaintiffs anticipate that Director Horn will provide discoverable information regarding the dissemination of the draft White Tiger executive summary, and the current status of the NDIC White Tiger Project.

13) Robert Collins, Ronald Strong and Margaret Potter, NDIC personnel. Plaintiffs anticipate that Collins, Strong and Potter will provide discoverable information regarding Schulz's interactions with NDIC, the scheduling and authorization of a meeting and Schulz's attendance at the meeting at the NDIC regarding "Mexico Narcopolitics."

14) Attorney General Janet Reno, U.S. Department of Justice, who will speak to the substance and content of the March 21, 2000 letter to Mr. Warren B. Rudman.

15) Representatives of various federal agencies including, but not limited to, the U.S. Army War College, FBI, DEA, U.S. Customs, U.S. Immigration and Naturalization Service, DOD, NDIC, White House drug czar, and others yet unknown.

16) Any additional witnesses which may become known to Laredo, including John Does 1 through 10, through the course of discovery.

B. Documents

1) The March 21, 2000 correspondence from Attorney General Janet Reno to Warren B. Rudman, attached as Exhibit A to the complaint.

2) Declaration of Michael T. Horn, submitted in connection with the Merit Systems Protection Board case captioned *Daniel S. Huffman v. Department of Justice*, Docket No. PH-0752-00-0073-I-1, attached as Exhibit B to the complaint.

3) The May 31, 1999 El Finarcerio article entitled *The Hanks, on the U.S. Anti-Drug Lookout; they are a risk, they warn*, attached as Exhibit C to the complaint.

4) The March 29, 1999 Insight Magazine article entitled *Family Affairs*, attached as Exhibit D to the complaint.

5) The June 2, 1999 Washington Post article entitled *U.S. See Threat From Criminal Enterprises of Mexican Family*, attached as Exhibit E to the complaint.

6) Additional articles generated in response to the dissemination of the White Tiger Executive Summary, including those attached as Exhibits F and N to the complaint.

7) The record generated in the Merit System Protection Board case entitled *Daniel S. Huffman v. Department of Justice*, Docket No. PH-0752-00-0073-I-1, including those documents attached as Exhibits G through M, and Q to the complaint.

8) Any additional documents which may become known or relevant to this action through the course of discovery.

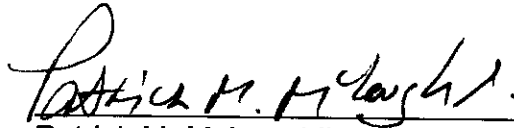
C. Computation of Damages

1) Laredo has not completed the calculation of the damages resulting from the conduct alleged in the complaint. It is anticipated that expert testimony will be required to arrive at the loss figure.

D. Insurance Agreements

1) There are no insurance agreements known, at this time, applicable to this litigation.

Respectfully submitted,



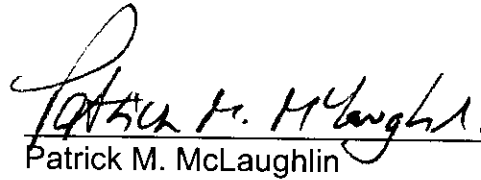
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Counsel for plaintiffs

Certificate of Service

A copy of the foregoing Plaintiffs' Initial Disclosures Pursuant to Fed. R. Civ. P. 26(A) has been served by hand-delivery upon Philip J. Weaver, Jr., Smith, Marshall, Weaver & Vergon, counsel for defendant, in the Courtroom of Judge Lesley Wells, on this the 12th day of December, 2000.


Patrick M. McLaughlin